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ARCADIS U.S., Inc.

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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Studies Semi-Annual Progress Report (February – July 2007)

Dear Jim:

Attached is the first semi-annual progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental RI/FS. This progress report is submitted as per Section 7.2 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). Per Section 7.2 of the SOW, the semi-annual progress reports "shall address all areas of the Site where Respondents perform SRI/FS activities and shall summarize overall progress in completing the work required by the AOC and SOW."

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

Michael J. Erickson, P.E. Associate Vice President

Attachment

Copies:

Michael Berkoff, USEPA Sam Chummar, USEPA Paul Bucholtz, MDEQ Bonnie Barnett, Esq., Drinker Biddle & Reath LLP Steven Cook, Esq., Millennium Holdings, LLC INDUSTRIAL

Date:

September 21, 2007

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Mr. James Saric September 21, 2007



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SEMI-ANNUAL PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE SRI/FS

REPORT #1, FEBRUARY TO JULY 2007

PREPARED BY ARCADIS BBL
ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

JAMES SARIC, REMEDIAL PROJECT MANAGER UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS

REPORT #1, FEBRUARY TO JULY 2007

Areas of the Site where SRI/FS Activities Have Been Performed Pursuant to the AOC and SOW

 Operable Unit 5 - Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to the confluence.

Summary of Overall Progress in Completing Work Required by the AOC and SOW

AOC Requirements

- On March 8, KRSG notified USEPA of the Project Coordinator for the SRI/FS, as required by Paragraph 28.
- On March 15, KRSG notified USEPA of the Contractor for the SRI/FS and provide the Contractor's Quality Management Plan, as required by paragraph 27. The Contractor for the SRI/FS is ARCADIS BBL.
- On March 23, KRSG notified USEPA of the subcontractors for the SRI/FS, as required by paragraph 27. The subcontractors included ARCADIS BBL, MATECO Drilling Company, Prein & Newhof, and Severn Trent Laboratories, Inc. (STL).
- On April 19, ARCADIS BBL forwarded to USEPA a certificate of insurance and policy for the SRI/FS as required by Paragraph 92.

SOW Requirements

Task 1. Project Scoping and SRI/FS Planning Documents

Submittals approved by USEPA and finalized:

- The Area 1 Work Plan was approved by USEPA and included as Attachment C of the AOC. This Work Plan was prepared in accordance with Section 1.3.
- The final approved Multi-Area Quality Assurance Project Plan (Multi-Area QAPP) was submitted to USEPA June 29 as per Section 1.2.1.2. On March 19, KRSG and USEPA held a planning meeting regarding the Multi-Area QAPP for the Site. On April 9, KRSG submitted the draft Multi-Area QAPP for the Site to USEPA. Notification of approval of the Multi-Area QAPP was provided by USEPA in a letter dated May 23, 2007 subject to requested changes, which are reflected in the final Multi-Area QAPP.

Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site SRI/FS

REPORT #1, FEBRUARY TO JULY 2007

Activities toward completion of other requirements:

- On March 8, KRSG submitted the Master Schedule for the SRI to USEPA, as required by Exhibit A.
- On April 5, MDEQ and KRSG met to discuss the long term monitoring program and on April 6, ARCADIS BBL forwarded to MDEQ and USEPA a letter summarizing the agreements documented during the April 5th meeting. The long-term monitoring program is required by Section 1.1.1.1.
- On April 9, KRSG submitted the draft Multi-Area Health and Safety Plan (HSP) for the Site to USEPA as required by Section 1.2.1.6.
- On April 25, KRSG submitted the draft *Multi-Area Field Sampling Plan* (FSP) for the Site to USEPA as required by Section 1.2.1.1.
- On May 3, KRSG met with USEPA, MDEQ, NOAA, and USFWS in Chicago to discuss the risk
 assessment framework (RAF) and the Baseline Ecological Risk Assessment (BERA) Peer Review
 Scope of Work. The RAF and peer review are discussed in Section 1.2.1.5 and Section 1.2.1.3,
 respectively. On May 4, ARCADIS BBL forwarded slides from the May 3 meeting to the meeting
 participants.
- On May 22, KSRG representatives conducted a site walk of the Willow Boulevard/A-Site OU (WB/A OU) and the Allied OU with Michael Berkoff of USEPA and Paul Bucholtz of MDEQ.
- On June 8, USEPA notified KRSG of the approval of extension of the due dates for the submittal of the Multi-Area RAF and BERA Peer Review Scope of Work. These documents were previously scheduled for submittal to USEPA by June 21.
- On June 8, KRSG submitted to USEPA the Multi-Area Data Management Plan (DMP). The DMP is discussed in Section 1.3.
- On June 21, KRSG submitted to USEPA the draft Conceptual Site Model (CSM). The CSM is discussed in Section 1.2.1.4.
- On June 26, KRSG forwarded to USEPA the draft Charge for the Peer Review Panel.
- On June 28, USEPA and KRSG participated in a conference call to discuss the Charge for the Peer Review Panel and the upcoming meeting on July 10th to discuss the RAF.
- On July 10, USEPA and KRSG met for additional discussion of the RAF and peer review process.

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Task 2. Site Characterization

No meetings, submittals, or notifications

Task 3. Remedial Investigation Report (including ecological and human health risk assessment)

No meetings, submittals, or notifications

Task 4. Treatability Studies (if needed)

No meetings, submittals, or notifications

Task 5. Development of Screening Alternatives (Technical Memorandum)

No meetings, submittals, or notifications

Task 6. Detailed Analysis of Alternatives (FS Report)

No meetings, submittals, or notifications

Task 7. Progress Reports

The first six monthly progress reports were submitted on time, as required by Section 7.1.